

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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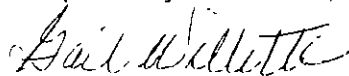
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DONALD J. O'HARA
(OCA/USPS-T-30-1-4)
July 30, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



EMMETT RAND COSTICH

Assistant Director

Office of the Consumer Advocate

OCA/USPS-T30-1. The following interrogatory refers to USPS-T-30, W/P III, Revised 7-23-97. In each of the following instances, the data appears to disagree with the source cited. Please indicate which information is correct and provide corrected workpapers and sources as appropriate.

- a. USPS-T-30, W/P III, Revised 7-23-97, indicates the following cost adjustments to Priority Mail: Delivery Confirmation - 78,949, Package Services - 1,776, and Standard A Single Piece - 24,174. (Trailing zeros have been omitted.) USPS-T-33, Table 6 at 23 indicates the following cost adjustments to Priority Mail: Delivery Confirmation - 69,755,871, Package Services - 1,793,669, and "Third Class Single Piece 12 to 16 ounce Conversion" - 24,416,810. Please indicate what the correct amount is. If the numbers in W/P III, Revised 7-23-97, are calculated, please show the derivation of each, cite all sources and provide copies of source documents not previously submitted.
- b. USPS-T-30, W/P III, Revised 7-23-97, indicates the following cost adjustments to Express Mail: Delivery Confirmation - (5,029) and Package Services - 532. (Trailing zeros are omitted.) USPS-T-33 at 13 indicates the following cost adjustments to Express Mail: Delivery Confirmation - (5,079,750) and Packaging Services - 537,184. Please indicate what the correct amount is. If the numbers in W/P III, Revised 7-23-97, are calculated, please show the derivation of each, cite all sources and provide copies of source documents not previously submitted.
- c. USPS-T-30, W/P III, Revised 7-23-97, cites "USPS-T-38, WP BPM 1" as the source of the 13,443, however, "USPS-T-38 WP BPM 1" does not indicate a

13,443 cost adjustment for Standard (B) Bound Printed Matter. Please show the derivation of the 13,443, cite all sources and provide copies of source documents not previously submitted.

- d. USPS-T-30, W/P III, Revised 7-23-97, indicates that the data reflected in the exhibit is "(\$000's, before contingency)." A review of each cite in USPS-T-38 includes the contingency. Please explain the apparent inconsistency between the "before contingency" notation on USPS-T-30, W/P III, Revised 7-23-97, and what is stated on USPS-T-38, WP-BPM1, WP-SR1 and WP-Lib1.
- e. USPS-T-30, W/P III, Revised 7-23-97, cites "USPS-T-38, WP SR 1" as the source of the (698), however, "WP SR 1" does not appear to indicate a (698) cost adjustment for Standard (B) Special. Please show the derivation of the (698), cite all sources referenced and provide copies of all source documents not previously submitted.
- f. USPS-T-30, W/P III, Revised 7-23-97, cites "USPS-T-38, Lib 1" as the source of the Library: Delivery Confirmation - 31, "Parcel/Spec. Serv. Reform" - (21), and the Total - 10, however, "USPS-T-38 WP Lib 1" does not appear to provide the breakdown of the Standard (B) Library rate. Please show the derivation of the 31 and the (21), cite all sources referenced and provide copies of all source documents not previously submitted.
- g. USPS-T-30, W/P III, Revised 7-23-97, cites "USPS-T-15" as the source of the "Single Cards Parcel/Spec. Serv. Reform" amount of (4,540). Please provide the specific cite within USPS-T-15. If the (4,540) is the result of a calculation, please

show its derivation, cite all sources referenced and provide copies of all source documents not previously submitted.

OCA/USPS-T30-2. Please cite the source documents used to support the (222,080) shown on USPS-T-30, W/P III, Revised 7-23-97, for Standard Mail A Single Piece. If the number is a result of a calculation, please show the derivation, cite all sources referenced and provide copies of all documents not previously submitted.

OCA/USPS-T30-3. Please cite the source document of the (3,865) shown on USPS-T-30, W/P III, Revised 7-23-97, for Special Services certified. If the number is a result of a calculation, please show the derivation, cite all sources referenced and provide copies of all documents not previously submitted.

OCA/USPS-T30-4. USPS-T-30, W/P III cites USPS-T-40, WP 13 as the source of the Insurance adjustment of 6,585 for "Parcel/Spec.Serv. Reform." A review of USPS-T-40, WP-13 indicates a total cost of 48,288,139 for insurance. Please show the derivation of the 6,585, cite all sources referenced and provide copies of all documents not previously submitted.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


EMMETT RAND COSTICH
Attorney

Washington, D.C. 20268-0001
July 30, 1997